

# EXHIBIT B

**From:** [ntwallace@aol.com](mailto:ntwallace@aol.com)  
**To:** [Christopher Michaels](#)  
**Subject:** Fw: Request for an extension  
**Date:** Tuesday, March 21, 2023 11:13:57 AM  
**Attachments:** [Technovative- Order Scheduling Expedited Hearing.pdf](#)  
[Stream- Order Granting Expedited Hearing.pdf](#)

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[Sent from the all new AOL app for Android](#)

----- Forwarded Message -----

**From:** "Warns, Tom A." <Tom.Warns@klgates.com>  
**To:** "ntwallace@aol.com" <ntwallace@aol.com>  
**Cc:** "Edel, Jon N." <Jon.Edel@klgates.com>, "Westbrook, Margaret" <Margaret.Westbrook@klgates.com>, "Rothman, Aaron S." <Aaron.Rothman@klgates.com>, "Caponi, Steven L." <Steven.Caponi@klgates.com>  
**Sent:** Tue, Mar 21, 2023 at 10:31 AM  
**Subject:** RE: Request for an extension  
Neil,

Steve is on a plane today and asked me to respond to your email. First of all, I hope your surgery went well and that you are recovering.

While we always try to accommodate a request for an extension as a professional courtesy when possible, we are unable to do so in these circumstances. As you are aware, we have filed an emergency application to lift the automatic stay so we can return to the Delaware Court of Chancery for a trial in the 225 Action. As you may have seen, the Court has granted our request for an expedited hearing, which will be heard tomorrow at 1:30 (see attached). It is absolutely critical to our client that we obtain the requested relief as quickly as possible. In addition, as evidenced by the Court of Chancery's decision to deny Rembrandt's motion to intervene, the 225 Action has nothing to do with Rembrandt.

Best,  
Tom

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**From:** Caponi, Steven L. <Steven.Caponi@klgates.com>  
**Sent:** Tuesday, March 21, 2023 8:04 AM  
**To:** KLG - Stream <klgstream@klgates.com>  
**Subject:** Fwd: Request for an extension

**Steven L. Caponi | K&L Gates**  
600 N. King St., Suite 900  
Wilmington, Delaware 19801  
Phone: 302-416-7080  
Email [steven.caponi@klgates.com](mailto:steven.caponi@klgates.com)

Begin forwarded message:

**From:** [ntwallace@aol.com](mailto:ntwallace@aol.com)  
**Date:** March 21, 2023 at 7:56:10 AM EDT  
**To:** "Caponi, Steven L." <[Steven.Caponi@klgates.com](mailto:Steven.Caponi@klgates.com)>  
**Subject:** Request for an extension  
**Reply-To:** [ntwallace@aol.com](mailto:ntwallace@aol.com)

Dear Mr. Caponi:

We are attempting to locate bankruptcy counsel in ED of PA. I was in surgery last week and had to go back today. We are requesting the same extension we provided the defendants in the Delaware District court action, specifically, 30 days to allow us to find counsel and prepare a response to your motion.

Request for notice

On behalf of Rembrandt 3D Holding Ltd (Rembrandt) I am requesting notice as a representative a party in interest under Local Rule 2002-1. Rembrandt is an interested party because it has filed a complaint against Technovative, Inc, SeeCubic, Inc., and Hawk Investment Holdings Ltd. In U.S. District Court, District of Delaware (Wilmington), CASE #: 1:23-cv-00193-GBW requesting an injunction against misappropriations and further disclosure of Rembrandt's trade secrets that are currently in the possession of Technovative. Rembrandt has requested a similar extension of time from Hawk as Rembrandt provided in the Delaware action to allow Rembrandt to find Delaware counsel to file a response to Hawk's motion.

Notice for Rembrandt should be sent to

Name: [michaels@bpmlegal.com](mailto:michaels@bpmlegal.com), attorney for Rembrandt Holding Ltd.

Address: 118 N Tioga St, Ithaca, NY 14850

Telephone number: 607-203-9470

Fax number: 607-256-2000

Eemail address: [michaels@bpmlegal.com](mailto:michaels@bpmlegal.com)

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